

AIR QUALITY PERMIT

Issued To: A.M. Welles, Inc.
P.O. Box 2808
Norris, MT 59745

Permit: # 2921-01
Application Complete: 07/31/06
Preliminary Determination Issued: 08/02/06
Department's Decision Issued: 8/18/06
Permit Final: 9/06/06
AFS #:777-2921

An air quality permit, with conditions, is hereby granted to A.M. Welles, Inc. (Welles) pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location:

Welles owns and operates a portable crushing and screening facility located in the NW ¼ of Section 15, Township 2 South, Range 4 East in Gallatin County, Montana. Permit #2921-01 applies while operating at any location in Montana, except those areas having a Department of Environmental Quality (Department) approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum will be required for PM₁₀ nonattainment areas.

B. Current Permit Action:

The permit action is to add a primary jaw crusher (400 tons per hour (TPH)), three screens (400 TPH, 200 TPH, 200 TPH), and a secondary cone crusher (200 TPH) to the existing facility. In addition, Welles proposes to upgrade the existing generator from 650 kW to 1000 kW.

Permit #2921-01 was also updated to reflect the current permit language and rule references used by the Department. A complete list of permitted equipment is contained in Section I.A. of the Permit Analysis.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. All visible emissions from any Standards of Performance for New Stationary Source (NSPS)-affected crusher shall not exhibit an opacity of 15% or greater averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR 60, Subpart OOO).
2. All visible emissions from any other NSPS-affected equipment, such as screens or conveyor transfers, shall not exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.340 and 40 CFR, Subpart OOO).
3. All visible emissions from any non-NSPS affected equipment shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).

4. Water and spray bars shall be available on site at all times and operated as necessary to maintain compliance with the opacity limitations in Sections II.A.1, II.A.2, and II.A.3 (ARM 17.8.752).
5. Welles shall not cause or authorize to be discharged into the atmosphere from any street, road or parking lot any visible fugitive emissions that exhibit an opacity of 20% or greater (ARM 17.8.308 and ARM 17.8.752).
6. Welles shall treat all unpaved portions of the haul roads, access roads, parking lots, or the general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).
7. Welles shall not operate more than three crushers at any given time and the maximum combined rated design capacity of the crushers shall not exceed 800 tons per hour (TPH) (ARM 17.8.749).
8. Crushing production from the facility is limited to 7,008,000 tons during any rolling 12-month time period (ARM 17.8.749).
9. Welles shall not operate more than three screens at any given time and the maximum combined rated design capacity of the screens shall not exceed 800 TPH (ARM 17.8.749).
10. Screening production is limited to 7,008,000 tons during any rolling 12-month time period (ARM 17.8.749).
11. Welles shall not operate more than one diesel generator at any given time, the maximum rated design capacity shall be between 450 kilowatts (kW) and 1000 kW, and operation shall not exceed 4900 hours during any rolling 12-month time period (ARM 17.8.749).
12. If the permitted equipment is used in conjunction with any other equipment owned or operated by Welles, at the same site, production shall be limited to correspond with an emission level that does not exceed 250 tons during any rolling 12-month period. Any calculations used to establish production levels shall be approved by the Department (ARM 17.8.749).
13. Welles shall comply with all applicable standards and limitations, and the reporting, recordkeeping, testing, and notification requirements contained in 40 CFR 60, Subpart OOO (ARM 17.8.340 and 40 CFR 60, Subpart OOO).

B. Testing Requirements

1. Within 60 days after achieving maximum production, but no later than 180 days after initial start-up, an Environmental Protection Agency (EPA) Method 9 opacity test and/or other methods and procedures as specified in 40 CFR 60.675 must be performed on all NSPS affected equipment to demonstrate compliance with the emission limitations contained in Section II.A.1 and II.A.2 (ARM 17.8.340 and 40 CFR 60, General Provisions and Subpart OOO).

2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures manual (ARM 17.8.106).
3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. If this crushing/screening plant is moved to another location, an Intent to Transfer form must be sent to the Department. In addition, a Public Notice Form for Change of Location must be published in a newspaper of general circulation in the area to which the transfer is to be made, at least 15 days prior to the move. The Intent to Transfer form and the proof of publication (affidavit) of the Public Notice Form for Change of Location must be submitted to the Department prior to the move. These forms are available from the Department (ARM 17.8.765).
2. Welles shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but not be limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

3. Welles shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to startup or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
4. Welles shall maintain on-site records showing daily hours of operation and daily production rates for the last 12 months. The records compiled in accordance with this permit shall be maintained by Welles as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
5. Welles shall document, by month, the crushing production from the facility. By the 25th day of each month, Welles shall calculate the crushing production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.8. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

6. Welles shall document, by month, the screening production from the facility. By the 25th day of each month, Welles shall calculate the screening production from the facility for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.10. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
7. Welles shall document, by month, the hours of operation of the diesel generator. By the 25th day of each month, Welles shall calculate the hours of operation for the diesel generator for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.11. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
8. Welles shall annually certify that its emissions are less than those that would require the facility to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emissions inventory information (ARM 17.8.749 and ARM 17.8.1204).

SECTION III: General Conditions

- A. Inspection – Welles shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if Welles fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Welles of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided for in ARM 17.8.740, *et seq.* (ARM 17.8.756)
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by Department personnel at the location of the permitted source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Welles may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Construction Commencement – Construction must be begin within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (ARM 17.8.762).
- I. The Department may modify the conditions of this permit based on local conditions of any future site. These factors may include, but are not limited to, local terrain, meteorological conditions, proximity to residences, etc.
- J. Welles shall comply with the conditions contained in this permit while operating in any location in Montana, except within those areas that have a Department-approved permitting program.

Permit Analysis
A.M. Welles
Permit # 2921-01

I. Introduction/Process Description

A. Permitted Equipment:

A.M. Welles, Inc. (Welles) owns and operates a portable crushing and screening facility consisting of the following equipment:

- Primary Jaw Crusher (400 tons per hour (TPH));
- 3 Deck Screen (400 TPH);
- Secondary Cone Crusher (2 at 200 TPH each);
- 3 Deck Screen (2 at 200 TPH each);
- 1000 kW diesel generator; and
- Other associated equipment.

Permit #2921-01 applies while operating at any location in Montana, except those areas having a Department approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of certain particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum will be required for locations in or within 10 km of certain PM₁₀ nonattainment areas.

B. Source Description:

Welles proposes to use this crushing/screening plant and associated equipment to crush sand and gravel for use in various construction operations. For a typical operation setup, materials are crushed by the primary jaw crusher and sent to the screens. The material is then sent to the cone crusher and screened for further reduction. Material is separated by size and stockpiled, or sent back to the crusher via conveyors.

C. Permit History:

On April 21, 1996, Welles was issued a permit to operate a portable 1995 Cedarapids 1313 Cone Crusher, a 1995 El Jay Screen, a 650 kW Detroit diesel generator and associated equipment. Welles was assigned Permit # **2921-00**.

D. Current Permit Action:

On June 25, 2006, Welles requested an alteration to Permit #2921-00 for the addition of a primary jaw crusher (400 TPH), three 3-deck screens (400 TPH, 200 TPH, 200 TPH), and a secondary cone crusher (200 TPH) to the existing facility. In addition, Welles proposes to upgrade the existing generator from 650 kW to 1000 kW. Permit #2921-01 was also updated to reflect current permit language and rule references used by the Department. Permit #**2921-01** replaces Permit #2921-00.

E. Additional Information

Additional information, such as applicable rules and regulations, best available control technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Welles shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

Welles must maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
 2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Welles shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
 3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this section.
 4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause or authorize to be discharged into the atmosphere particulate matter in excess of the amount set forth in this section.
 5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this section.
 6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank truck or trailer is equipped with a vapor loss control device as described in (1) of this rule.
 7. ARM 17.8.340 Standard of Performance for New Stationary Sources. This rule incorporates, by reference, 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). Welles is considered an NSPS affected facility under 40 CFR 60 and is subject to the requirements of Subpart OOO.
- D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:
1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. Welles submitted the appropriate permit application fee for the current permit action.
 2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department; the air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter, or use any asphalt plant, crusher or screen that has the potential to emit (PTE) greater than 15 tons per year of any pollutant. Welles has a PTE greater than 15 tons per year of PM, PM₁₀, oxides of nitrogen (NO_x), carbon monoxide (CO), and oxides of sulfur (SO_x); therefore, an air quality permit is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
 4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. Welles submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. Welles submitted an affidavit of publication of public notice in the June 23, 2006, issue of the Bozeman Daily Chronicle, a newspaper of general circulation in Gallatin County, as proof of compliance with the public notice requirements.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Welles of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
 11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
 12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
 13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
 14. ARM 17.8.765 Transfer of Permit. (1) This rule states that an air quality permit may be transferred from one location to another if the Department receives a complete notice of intent to transfer location, the facility will operate in the new location for less than 1 year, the facility will comply with the FCAA and the Clean Air Act of Montana, and the facility complies with other applicable rules. (2) This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names of the transferor and the transferee, is sent to the Department.
- F. ARM 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
 2. ARM 17.8.818 Review of Major Stationary Sources and Major Modification--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source since it is not a listed source and the facility's PTE is less than 250 tons per year of any pollutant (excluding fugitive emissions).

- G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:
1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE > 100 tons/year of any pollutant,
 - b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule, or
 - c. PTE > 70 tons/year of PM₁₀ in a serious PM₁₀ nonattainment area.
 2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #2921-01 for Welles, the following conclusions were made:
 - a. The facility's PTE is less than 100 tons/year for any pollutant.
 - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year of all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NESHAP standards.
 - e. This source is not a Title IV affected source or a solid waste combustion unit.
 - f. This source is not an EPA designated Title V source.

Based on these facts, the Department has determined that Welles will be a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Welles will be required to obtain a Title V Operating Permit.
 - g. ARM 17.8.1204(3). The Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's PTE.
 - i. In applying for an exemption under this section, the owner or operator of the facility shall certify to the Department that the source's PTE does not require the source to obtain an air quality operating permit.
 - ii. Any source that obtains a federally enforceable limit on PTE shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.

3. ARM 17.8.1207, Certification of Truth, Accuracy, and Completeness. The compliance certification submittal by ARM 17.8.1204(3) shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this subchapter shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III. BACT Determination

A BACT determination is required for each new or altered source. Welles shall install on the new or altered source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized.

A. Area Source Fugitive Emissions and Crushing/Screening Emissions

Two types of emissions controls are readily available and used for dust suppression of fugitive emissions at the site, fugitive emissions for the surrounding area of operations, and for equipment emissions from the crushing/screening operation. These two control methods are water and chemical dust suppressant. Chemical dust suppressant could be used on the area surrounding the crushing/screening operation, and for emissions from the crushing/screening operation. However, because water is more readily available, is more cost effective, is equally effective as chemical dust suppressant, and is more environmentally friendly, water has been identified as the most appropriate method of pollution control of particulate emissions for the general plant area. In addition, water suppression has been required of recently permitted similar sources. Welles may, however, use chemical dust suppressant to assist in controlling particulate emissions from the surrounding plant area.

Welles shall not cause or authorize to be discharged into the atmosphere from any NSPS-affected crusher, any visible emissions that exhibit an opacity of 15% or greater averaged over 6 consecutive minutes. Also, Welles shall not cause or authorize to be discharged into the atmosphere from any affected screens, conveyor transfers, or other NSPS-affected equipment, any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes. Further, Welles shall not cause or authorize to be discharged into the atmosphere from any non-NSPS affected equipment, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. Welles must also take reasonable precautions to limit the fugitive emissions of airborne particulate matter from haul roads, access roads, parking areas, and the general area of operation. Welles is required to have water spray bars and water available on site (at all times) and to apply the water, as necessary, to maintain compliance with the opacity and reasonable precaution limitations. Welles may also use chemical dust suppression, in order to maintain compliance with emission limitations in Section II.A of Permit #2921-01. The Department determined that using water spray bars, water, and chemical dust suppressant to maintain compliance with the opacity requirements and reasonable precaution limitations constitutes BACT for the crushing/screening operation.

B. Diesel Generator

Due to the limited amount of emissions produced by the diesel generator/engine and the lack of readily available, cost effective add-on controls; add-on controls would be cost prohibitive. Therefore, the Department determined proper operation and maintenance with no add-on controls would constitute BACT for the diesel generator/engine.

The control options required for the proposed crushing/screening facility are comparable to other recently permitted similar sources, and are capable of achieving the appropriate emission standards.

IV. Emission Inventory

Source	Tons/Year (TPY)					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
Crushers (Jaw @ 400 TPH, 2 Cones @ 200 TPH)	4.20	1.89	0	0	0	0
Screens (1 @ 400 TPH, 2 @ 200 TPH)	7.71	2.59	0	0	0	0
Material Transfer	2.21	0.73	0	0	0	0
Pile Forming	16.82	7.88	0	0	0	0
Bulk Loading	0.06	0.03	0	0	0	0
Diesel Generator * (1000 kW)	2.30	1.25	78.75	2.32	18.07	26.58
Haul Roads	6.34	1.80	0	0	0	0
Total	48.41	16.17	78.75	2.32	18.07	26.58

*NOTE: The diesel generator was restricted to 4900 hours per rolling 12-months to stay below the Title V threshold of 100 TPY.

Crusher (800 TPH)

(Jaw Crusher @ 400 TPH, 2 Cone Crushers @ 200 TPH)

Process Rate: 800 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0012 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/2004)
Calculations: 0.0012 lbs/ton * 800 tons/hr = 0.96 lbs/hr
0.96 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = 4.2048 tons/yr

PM-10 Emissions:

Emission Factor: 0.00054 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/04)
Calculations: 0.00054 lbs/ton * 800 tons/hr = 0.43 lbs/hr
0.432 lbs/hr * 8760 hr/yr * 0.0005 ton/lb = 1.89216 tons/yr

Screen (800 TPH)

(1 Deck Screen at 400 TPH, two Deck screens @ 200 TPH)

Process Rate: 800 tons/hr
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0022 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/04)
Calculations: $0.0022 \text{ lbs/ton} \times 800 \text{ tons/hr} = 1.76 \text{ lbs/hr}$
 $1.76 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ ton/lb} = 7.7088 \text{ tons/yr}$

PM-10 Emissions:

Emission Factor: 0.00074 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/04)
Calculations: $0.00074 \text{ lbs/ton} \times 800 \text{ tons/hr} = 0.59 \text{ lbs/hr}$
 $0.592 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ ton/lb} = 2.59296 \text{ tons/yr}$

Material Transfer

Process Rate: 400 tons/hr
Number of Transfers: 9 Transfers
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.00014 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/04)
Calculations: $0.00014 \text{ lbs/ton} \times 400 \text{ tons/hr} \times 9 \text{ Transfers} = 0.50 \text{ lbs/hr}$
 $0.504 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ ton/lb} = 2.20752 \text{ tons/yr}$

PM-10 Emissions:

Emission Factor: 0.000046 lbs/ton Controlled (AP-42, Table 11.19.2-2, 8/04)
Calculations: $0.000046 \text{ lbs/ton} \times 400 \text{ tons/hr} \times 9 \text{ Transfers} = 0.17 \text{ lbs/hr}$
 $0.1656 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ ton/lb} = 0.725328 \text{ tons/yr}$

Pile Forming

Process Rate: 400 tons/hr
Number of Piles: 3 Piles
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor: 0.0032 lbs/ton Controlled (AP-42, Section 13.2.4, 1/95)
Calculations: $0.0032 \text{ lbs/ton} \times 400 \text{ tons/hr} \times 3 \text{ Piles} = 3.84 \text{ lbs/hr}$
 $3.84 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ tons/lb} = 16.82 \text{ tons/yr}$

PM-10 Emissions:

Emission Factor: 0.0015 lbs/ton Controlled (AP-42, Section 13.2.4, 1/95)
Calculations: $0.0015 \text{ lbs/ton} \times 400 \text{ tons/hr} \times 3 \text{ Piles} = 1.80 \text{ lbs/hr}$
 $1.8 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 0.0005 \text{ tons/lb} = 7.88 \text{ tons/yr}$

Bulk Loading

Process Rate: 400 tons/hr
Number of Loads 2 Load
Hours of operation: 8760 hr/yr

PM Emissions:

Emission Factor:	1.60E-05 lbs/ton	AP-42 Section 11.19 (8/04)	
Calculations:	0.000016 lbs/ton * 400 tons/hr * 2 Load =	0.01 lbs/hr	
	0.0128 lbs/hr * 8760 hr/yr * 0.0005 tons/lb =		0.06 tons/yr

PM-10 Emissions:

Emission Factor:	1.60E-05 lbs/ton	AP-42 Section 11.19 (8/04)	
Control Efficiency:	50%	0	
Calculations:	0.000016 lbs/ton * 400 tons/hr * 2 Load =	0.01 lbs/hr	
	0.0128 lbs/hr * 8760 hr/yr * 0.0005 tons/lb =		0.06 tons/yr
	0.056064 tons/yr * (1 - 0.5) =	0.03 tons/yr	

Diesel Generator(s) (kw)

Generator Size = 1000 kw
1kw = 1.3410 hp
1000 kw * 1.341 = 1341.0 hp
7000 Btu= 1 Hp-hr

Hours of Operation: 4900 hrs/yr

PM Emissions

Emission Factor	0.0007 lbs/hp-hr	(AP-42 Table 3.4-1, 10/96)	
Calculations	1341 hp * 0.0007 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		2.30 tons/yr

PM-10 Emissions

Emission Factor	0.0004 lbs/hp-hr	(AP-42 Table 3.4-2, 10/96)	
Calculations	1341 hp * 0.0004 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		1.25 tons/yr

NOX Emissions

Emission Factor	0.0240 lbs/hp-hr	(AP-42 Table 3.4-1, 10/96)	
Calculations	1341 hp * 0.024 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		78.85 tons/yr

VOC Emissions

Emission Factor	0.00071 lbs/hp-hr	(AP-42 Table 3.4-1, 10/96)	
Calculations	1341 hp * 0.000705 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		2.32 tons/yr

CO Emissions

Emission Factor	0.00550 lbs/hp-hr	(AP-42 Table 3.4-1, 10/96)	
Calculations	1341 hp * 0.0055 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		18.07 tons/yr

SOX Emissions

Emission Factor	0.00809 lbs/hp-hr	(AP-42 Table 3.4-1, 10/96)	
Calculations	1341 hp * 0.00809 lbs/hp-hr * 4900 hrs/yr * 0.0005 tons/lb =		26.58 tons/yr

Haul Roads

Vehicle miles traveled: 5 VMT/day {Estimated}
Control Efficiency included in Emission Factor

PM Emissions:

PM Emission Factor (Rated Load Capacity <50 tons): 13.90 Lbs/VMT (AP-42, Section 13.2.2, 12/03)

PM= (5 VMT/day)(13.90 Lbs/VMT)(0.5)

PM= 34.75 Lbs/day
6.34 tons/yr

PM10 Emissions:

PM10 Emission Factor (Rated Load Capacity <50 tons): 3.95 Lbs/VMT (AP-42, Section 13.2.2, 12/03)

PM10= (5 VMT/day)(3.95 Lbs/VMT)(0.5)

PM10= 9.88 Lbs/day
1.80 tons/yr

V. Existing Air Quality

Permit #2921-01 applies while operating at any location in Montana designated as attainment or unclassified for all National Ambient Air Quality Standards (NAAQS), except those areas having a Department approved permitting program, areas considered tribal lands, or areas in or within 10 kilometers (km) of a PM₁₀ nonattainment areas. *A Missoula County air quality permit will be required for locations within Missoula County, Montana.* An addendum will be required for locations in or within 10 km of certain PM₁₀ nonattainment areas.

VI. Air Quality Impacts

This permit is for a portable crushing/screening plant to be located at various locations around Montana. Permit #2921-01 contains operation conditions and limitations that would protect air quality for the site and surrounding area. Because this facility is a portable source that would operate on an intermittent and temporary basis, any effects to air quality will be minor. Further, the Department believes the amount of controlled emissions generated by this project will not exceed any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VIII. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, MT 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: A. M. Welles, Inc.
P.O. Box 2808
Norris, MT 59745

Air Quality Permit number: 2921-01

Preliminary Determination Issued: 8/02/06

Department Decision Issued 8/18/06

Permit Final: 9/06/06

1. Legal Description of Site: Permit #2921-01 applies to the source while operating at any location in Montana except within those areas having a Department approved permitting program, those areas considered tribal lands, or areas in or within 10 kilometers (km) of certain PM₁₀ nonattainment areas. A Missoula County air quality permit will be required for locations within Missoula County, Montana. An addendum will be required for locations in or within 10 km of certain PM₁₀ nonattainment areas.
2. Description of Project: Welles owns and operates a portable crushing facility consisting of the following equipment: Jaw Crusher (400 TPH), 3 deck screen (400 TPH), two secondary cone crushers (200 TPH each), two 3 deck screens (200 TPH each), 1000 kilowatt (kW) diesel generator, and other associated equipment.
3. Objectives of Project: The objective of this project would be to produce business and revenue for Welles through the sale and use of aggregate. The issuance of the permit would allow Welles to operate the permitted equipment at various locations throughout Montana, including the proposed initial site location.
4. Alternatives Considered: In addition to the proposed action, the Department also considered the “no-action” alternative. The “no-action” alternative would deny issuance of the air quality preconstruction permit to the proposed facility. However, the Department does not consider the “no-action” alternative to be appropriate because Welles has demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the “no-action” alternative was eliminated from further consideration.
5. A Listing of Mitigation, Stipulations, and Other Controls: A list of enforceable conditions, including a BACT analysis, would be included in Permit #2921-01.
6. Regulatory Effects on Private Property: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Terrestrial and Aquatic Life and Habitats			x			Yes
B	Water Quality, Quantity, and Distribution			x			Yes
C	Geology and Soil Quality, Stability and Moisture			x			Yes
D	Vegetation Cover, Quantity, and Quality			x			Yes
E	Aesthetics			x			Yes
F	Air Quality			x			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources			x			Yes
H	Demands on Environmental Resource of Water, Air and Energy			x			Yes
I	Historical and Archaeological Sites				x		Yes
J	Cumulative and Secondary Impacts			x			Yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic life and Habitats

There is a possibility that terrestrials would use the same area as the crushing and screening operation. Impacts on terrestrials and aquatic life could result from storm water runoff and pollutant deposition, but such impacts would be minor, as the crushing and screening operations would be considered a minor source of emissions and would have intermittent and seasonal operations. Furthermore, the air emissions would have only minor effects on terrestrial and aquatic life because facility emissions would have good pollutant dispersion in the area of operations (see section 7.F). Therefore, only minor and temporary effects to terrestrial and aquatic life and habitat would be expected from the proposed project.

B. Water Quality, Quantity and Distribution

Water will be required for dust suppression on the surrounding roadways, at areas of operation, and pollution control for equipment operations. However, pollutant deposition and water use would only cause minor, if any, impacts to water resources in these areas because: the facility is small, the project would have seasonal and intermittent operations, and only a small volume of water would be used. Overall, the additional equipment would have minor impacts to water quality, quantity, and distribution in the area of operation.

C. Geology and Soil Quality, Stability and Moisture

The proposed project would have minor impacts on geology, soil quality, stability, and moisture of soils. Minor impacts from deposition of air pollutants on soils would result (as described in Section 7.F of this EA) and minor amounts of water would be used for pollution control—only as necessary in controlling particulate emissions. Thus, minimal water runoff would occur. Since a small amount of pollution would be generated and corresponding emissions would be widely dispersed before settling upon vegetation and surrounding soils (as

described in Section 7.D of this EA), impacts would be minor. Therefore, any effects upon geology and soil quality, stability, and moisture from air pollutant emissions from equipment and operation would be minor and short-term.

D. Vegetation Cover, Quantity, and Quality

The facility would be considered a minor source of emissions by industrial standards and would typically operate in remote areas previously designated and used for this type of operation. The overall footprint of the facility will be small, so the affect to quantity and quality of vegetative cover in the area would be minimal. There are no known species of concern within the project area. However, the Dwarf Purple Monkeyflower (vascular plant) is located within three miles of the site and is considered a sensitive species of concern by the Montana Natural Heritage Program. As proposed, this project will not impact the Dwarf Purple Monkeyflower.

In addition, water use at the facility, soil disturbance from water application, and the associated runoff would also be minimal. Overall, impacts to vegetation from the project would be minor.

E. Aesthetics

Permit #2921-01 will include conditions to control emissions, including visible emissions, from the operation. The crushing and screening operation would be portable, would operate on an intermittent and seasonal basis, and would be considered a small industrial source.

According to the owner, the proposed project is located just off of Highway 84. There are few houses around the pit area with a golf course located to the north of the Highway. The owner restricts pit hours to lessen the noise impacts on neighbors. Therefore, the Department has determined that any disturbance to the aesthetic value of the area would be minor.

F. Air Quality

Air quality impacts from the proposed project would be minor because the facility would be relatively small and operate on an intermittent basis. Permit #2921-01 would include conditions limiting the facility's opacity and the facility's crushing and screening production. The permit will also limit total emissions from the crushing and screening facility and any additional equipment operated at the site to 250 tons per year or less excluding fugitive emissions.

Further, the Department determined that the crushing and screening facility would be a minor source of emissions as defined under the Title V Operating Permit Program because the source's PTE was below the major source threshold level of 100 tons per year for any regulated pollutant. Pollutant deposition from the facility would be minimal because the pollutants emitted would be well controlled, widely dispersed (from factors such as wind speed and wind direction), and would have minimal deposition on the surrounding area. Therefore, air quality impacts from operating the crushing and screening equipment in this area would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

The Department, in an effort to assess any potential impacts to any unique endangered, fragile, or limited environmental resources in the proposed area of operation (Section 15, Township 2 South, Range 4 East in Gallatin County, Montana) contacted the Montana Natural Heritage Program (MNHP). Search results concluded there is one known species of concern near the area. The search area, in this case, is defined by the township and range of the proposed site, with an additional one-mile buffer. The Dwarf Purple Monkeyflower is considered a sensitive species in the area but is not located on the project site.

Given the fact that the species of concern is not located within the operational area of the project and the portable nature of the crushing and screening operation, any effects would be minimal.

H. Demands on Environmental Resource of Water, Air and Energy

The crushing and screening operation would require a small quantity of water, air, and energy for proposed project. Small quantities of water would be required for dust suppression of emissions being generated at the site. Impacts to air resources would be minor because the source is considered a minor industrial source of emissions, with intermittent and seasonal operations. Energy requirements would also be relatively small, as the facility would be powered by an industrial diesel generator engine. In addition, the permit requires restrictions on the generator's size and hours of operation to minimize the effects to air quality. Therefore, impacts to water, air, and energy resources would be minor.

I. Historical and Archaeological Sites

The Department contacted the Montana Historical Society, State Historical Preservation Office (SHPO) in an effort to identify any historical and archaeological sites that may be present in the proposed area of construction and operation. Search results concluded that there are no previously recorded historical or archaeological resources of concern within the proposed area. According to the State Historic Preservation Office, there would be a low likelihood of adverse disturbance to any known archaeological or historic site. Therefore, no impacts upon historical or archaeological sites would be expected as a result of operating the proposed crushing and screening plant.

J. Cumulative and Secondary Impacts

The additional equipment would cause minor cumulative or secondary impacts to the physical and biological aspects of the human environment because the equipment would generate relatively small amounts of emissions of PM, PM₁₀, (NO_x), carbon monoxide (CO), volatile organic compounds (VOC) (including HAPs), and (SO_x). Emissions and noise generated from the equipment would, at most, result in only minor impacts to the area of operations because the crushing and screening plant would be relatively small, seasonal, and temporary. The proposed project would be short-term in nature, and have minor cumulative effects upon resources within the area. Overall, cumulative and secondary impacts to the physical and biological aspects of the human environment would be minor.

8. The following table summarizes the potential economic and social effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Social Structures and Mores				x		Yes
B	Cultural Uniqueness and Diversity				x		Yes
C	Local and State Tax Base and Tax Revenue			x			Yes
D	Agricultural or Industrial Production			x			Yes
E	Human Health			x			Yes
F	Access to and Quality of Recreational and Wilderness Activities			x			Yes
G	Quantity and Distribution of Employment			x			Yes
H	Distribution of Population				x		Yes
I	Demands for Government Services			x			Yes
J	Industrial and Commercial Activity			x			Yes
K	Locally Adopted Environmental Plans and Goals			x			Yes
L	Cumulative and Secondary Impacts			x			Yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. Social Structures and Mores

The proposed project would not cause any disruption to the social structures and mores in the area because the source would be a minor industrial source of emissions, and would only have temporary and intermittent operations. Further, the facility would be required to operate according to the conditions placed on Permit #2921-01 that would limit the effects to social structures and mores.

B. Cultural Uniqueness and Diversity

The facility is located on private land, the footprint of the project will be minor, and predominant use of the area would remain the same. The cultural uniqueness and diversity of this area would not be impacted by the proposed project because the facility would be a portable source, with seasonal and intermittent operations. Therefore, the cultural uniqueness and diversity of the area would not be affected.

C. Local and State Tax Base and Tax Revenue

The proposed project would result in minor, if any, impacts to the local and state tax base and tax revenue because the proposed project would require few additional employees. In addition, only minor amounts of construction would be required to complete the project, and the facility would be a minor industrial source of emissions with seasonal and intermittent operations. Welles currently operates a smaller facility on site and the expansion of the project will not change tax base or revenue for local or State government.

D. Agricultural or Industrial Production

The proposed project would have a minor impact on local industrial production since the facility would be a minor source of aggregate production with minor air emissions. The facility is located on private land and the mining process is currently contained to 20 acres. Because minimal deposition of air pollutants would occur on the surrounding land (as described above in Section 7.F), only minor and temporary effects on the surrounding vegetation or agricultural production would occur. In addition, the facility operations would be small and temporary in nature and would be permitted with operational conditions and limitations that would minimize impacts upon surrounding vegetation, as described in Section 7.D above. According to the owner most of the surrounding area is farm land; therefore, impacts to the surroundings will be minor.

E. Human Health

Conditions would be incorporated into Permit #2921-01 to ensure that the crushing and screening facility would operate in compliance with all applicable air quality rules and standards. These rules and standards are designed to be protective of human health. As described in Section 7.F of this EA, the air emissions from this facility would be minimized by the use of water spray and other process limits that would be required of Permit #2921-01. Further, the facility would operate on an intermittent and seasonal basis; and only minor impacts would be expected on human health from the proposed facility.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed project is situated near Highway 84 and a golf course, but access to this and other recreational opportunities will not be limited by this facility. Noise from the facility would be minimal to surroundings because of the facility size, hours of operation, and rural location. The facility would operate on a seasonal and intermittent basis on private land and would be a minor industrial source of emissions. Therefore, any changes in the quality of recreational and wilderness activities created by operating the equipment at this site would be minor.

G. Quantity and Distribution of Employment

The portable crushing and screening operation would be relatively small. As proposed, Welles will only employ a few people so impacts to employment will be minimal. In addition, the project would have seasonal and intermittent operations. There would be no known effects upon the quantity and distribution of employment in this area.

H. Distribution of Population

The portable crushing and screening operation would be small with few (2-4) employees. No individuals would be relocated to the area of operation as a result of the project because Welles does not plan to hire additional employees. Therefore, the facility would not impact the normal population distribution in the project area or any future operating site.

I. Demands for Government Services

There would be minimal to no increase in traffic on existing roadways and highways in the area from the proposed project. Government services would be required for acquiring the appropriate permits for the proposed project and to verify compliance with the permits that would be issued. However, demands for government services would be minor due to the relatively small size and seasonal nature of the crushing and screening facility.

J. Industrial and Commercial Activity

The proposed project would represent only a minor increase in the industrial activity in the proposed area of operation because the facility would continue to be a small industrial source, portable and temporary in nature. No additional industrial or commercial activity would be expected as a result of the proposed operation. Therefore, any impacts to the industrial and commercial activity would be minor.

K. Locally Adopted Environmental Plans and Goals

Welles would be allowed by Permit #2921-01 to operate in areas designated by EPA as attainment or unclassified for ambient air quality. An addendum would be required to operate in or within 10 km of a PM₁₀ nonattainment area. Permit #2921-01 would contain production and opacity limits for protecting air quality and to keep facility emissions in compliance with any applicable ambient air quality standards. Because the project is small and portable, any impacts from the facility would be minor and short-lived.

L. Cumulative and Secondary Impacts

Overall, the proposed project would cause minor cumulative and secondary impacts to the social and economic aspects of the human environment in the immediate area of operation because the source would be portable, and the footprint of the facility would remain relatively small. Further, no other industrial operations are expected to result from this permitting action. Any increase in traffic would have minor effects on local traffic in the immediate area.

This facility may be operated in conjunction with other equipment owned and operated by Welles, but any cumulative impacts or secondary impacts would be minor and short-term. In conclusion, the source is relatively small, the facility emissions will be minimal, and the project would have only minor cumulative and secondary impacts.

Recommendation: No EIS is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis:

The current permitting action is to add equipment to an existing portable crushing/screening operation. Permit #2921-01 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

EA prepared by: Jenny O'Mara
Date: July 31, 2006